

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: AKORN HOLDING COMPANY LLC, <i>et al.</i> , ¹ Debtors.	Chapter 7 Case No. 23-10253 (KBO) (Jointly Administered)
GEORGE L. MILLER, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company LLC, <i>et al.</i> , Plaintiff, v. CHEM-AQUA INC., Defendant.	Adv. Proc. No. 25-50109 (KBO) Re: Adv. D.I. 3 & 5

STIPULATION TO EXTEND TIME

In accordance with the *Order Establishing Streamlined Procedures Governing Adversary Proceedings With Total Amount in Controversy Less Than \$75,000.00 Brought by Plaintiff* [Adv. D.I. 5] (the “Procedures Order”), counsel for George L. Miller, solely in his capacity as Chapter 7 Trustee of Akorn Holding Company LLC, Akorn Intermediate Company LLC, and Akorn Operating Company LLC, and as plaintiff in this adversary proceeding (“Plaintiff”), and counsel for Chem-Aqua Inc. (“Defendant,” and together with Plaintiff, the “Parties”), hereby stipulate as follows:

¹ The Debtors in these Chapter 7 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Akorn Holding Company LLC (9190); Akorn Intermediate Company LLC (6123) and Akorn Operating Company LLC (6184). The Debtors’ headquarters was located at 5605 CenterPoint Court, Gurnee, Illinois 60031.

1. Plaintiff filed its complaint against Defendant on February 12, 2025 [Adv. D.I. 1] (the “Complaint”).

2. On June 11, 2025, the Court entered the Procedures Order in this adversary proceeding, which, among other things, allows the Parties to stipulate to an extension of the deadlines in the Procedures Order without further Court approval. Procedures Order ¶ 44.

3. Pursuant to the Procedures Order, the Parties have agreed that Defendant’s deadline to answer or otherwise respond to the Complaint shall be extended through and including December 4, 2025. The Parties have further agreed that the discovery deadlines set forth in section E of the Procedures Order shall be extended as follows:

- a. If this adversary proceeding has not been resolved or settled on or before December 4, 2025, then this adversary proceeding shall be referred to mediation.
- b. In the event that this adversary proceeding is referred to mediation, Defendant shall choose a mediator from the list of proposed mediators attached as Exhibit 2 to the Procedures Order and notify Plaintiff’s counsel of the selected mediator in accordance with the Procedures Order no later than December 8, 2025.
- c. Plaintiff will work with the selected mediator to schedule a mediation in accordance with the Procedures Order. The mediation must be concluded no later than January 9, 2026.

4. Subject to the extensions set forth herein, the procedures set forth in the Procedures Order remain in full force and effect.

5. In the event that this adversary proceeding remains open following mediation, then the Parties shall enter into a further stipulation, as provided for in paragraph 44 of the Procedures Order, regarding the discovery deadlines set forth in paragraph 14 through 22 of the Procedures Order.

Dated: November 20, 2025

SAUL EWING LLP

/s/ Paige N. Topper

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